

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No: 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO:</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<b>All Wave II TVT Cases</b>	
<b>All Wave II TVT-O Cases</b>	

**PLAINTIFF'S AMENDED UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
FILE ANY *DAUBERT* MOTION RELATED TO LARRY T. SIRLS, II, M.D.**

Plaintiff respectfully moves this Court for an order granting a ten (10) day extension of the filing *Daubert* Motion from the date of deposition. This is Plaintiff's first request for an extension of time for this deadline. This extension is not sought for reason of delay or for any other improper purpose. Counsel for Defendant has stated that they do not oppose the requested extension.

Due to scheduling difficulties, the deposition of Ethicon's expert Dr. Larry Sirls is scheduled for Thursday, July 21, 2016. Plaintiff respectfully moves the Court for an order extending the filing deadline for any *Daubert* briefing regarding Dr. Sirls until July 31, 2016 or by ten (10) days from the date of deposition if it is not, in fact, completed on July 21, 2016 as currently scheduled, , with the response and reply deadlines extended accordingly..

WHEREFORE, Plaintiff requests that the Court grant the requested ten (10) day extension from the date of deposition, moving the due date for Plaintiff's Motion to Limit the

Case Specific Opinions Offered by Larry T. Sirls, II, M.D. to **July 31, 2016** and Defendants' Case-Specific *Daubert* Motions response deadline to **August 18, 2016**, and Plaintiff's reply to **August 28, 2016**.

Dated: July 20, 2016

Respectfully submitted,

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**Plaintiff's Counsel**

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 20, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Fidelma L. Fitzpatrick

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**[PROPOSED] ORDER**

AND NOW, this \_\_\_\_\_ day of July, 2016, upon consideration of Plaintiff's Unopposed Motion to File Any *Daubert* Motion Related to Larry T. Sirls, II, M.D. in the above matter, it is hereby ORDERED that Plaintiff's Motion is GRANTED. Plaintiff's *Daubert* Motion is due by **July 31, 2016** and Defendants' Case-Specific *Daubert* Motions response deadline to **August 18, 2016**, and Plaintiff's reply to **August 28, 2016**.

**IT IS SO ORDERED.**

**BY THE COURT:**

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**JOSEPH R. GOODWIN  
UNITED STATES DISTRICT JUDGE**